

NOTICE
OF INTENT TO FLAG AIR QUALITY DATA
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL

This notice will provide public review and opportunity for comments to be submitted to the Tennessee Division of Air Pollution Control regarding the Division's intent to flag certain ambient air monitoring data generated during calendar year 2007 that may be affected by exceptional events.

Recently promulgated federal regulations, found at 40 CFR Parts 50 and 51 "Treatment of Data Influenced by Exceptional Events, Section V, The Management of Air Quality Data Affected by Exceptional Events, Section G, Public Availability of Air Quality Data and Demonstrations Related to Exceptional Events" published in **Federal Register** / Vol. 72, No. 55 / Thursday, March 22, 2007, formally define the procedures to be followed by monitoring agencies that desire to flag certain ambient monitoring data believed to be affected by exceptional events. The regulations also provide for public notice of the intent to flag the data (found on page 13581). This regulation can be found at the following web site:

<http://a257.g.akamaitech.net/7/257/2422/01%20jan20071800/edocket.access.gpo.gov/2007/pdf/E7-5156.pdf>

After the opportunity for public inspection, the Tennessee Division of Air Pollution Control will submit the final requested flagging documentation to the U.S. Environmental Protection Agency for concurrence.

The opportunity to review the potential data to be flagged will be provided through posting of the summary data as a part of this notice on the 7th day of January 2008.

Written comments will be responded to if they are received before the close of business January 22, 2008, at the office of the Technical Secretary, Tennessee Air Pollution Control Board, 9th Floor, L & C Annex, 401 Church Street, Nashville, TN 37243-1531.

Any individuals with disabilities who wish to review this information, should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such participation. Such initial contact may be in person, by writing, telephone, or other means, and should be made no less than ten (10) days prior to January 22, 2008 or the date such party intends to review such filings, to allow time to provide such aid or service. Contact the Tennessee Department of Environment and Conservation ADA Coordinator, 12th Floor, 401 Church Street, Nashville TN 37243, (615) 532-0207. Hearing impaired callers may use the Tennessee Relay Service (1-800-848-0298).

If you have any questions about the proposed data to be flagged, you may contact Mr. Jackie Waynick at (615) 532-0554. Copies of documents concerning this matter are available for review at the office of the Technical Secretary. For information about reviewing these documents, please contact Mr. Malcolm Butler, 9th Floor, L & C Annex, 401 Church Street, Nashville, TN 37243-1531, telephone (615) 532-0600.

Summary of Data to be Flagged

The Tennessee Division of Air Pollution Control submitted a letter of intent to the U. S. EPA Regional Office in Atlanta, Georgia on August 3, 2007 in which the Division identified dates that may have been impacted by emissions from forest fires during 2007. This letter emphasizes that both PM_{2.5} particulate and ozone levels may be affected by fires. The initial list of dates submitted was:

May 21, 2007 to May 22, 2007
May 31, 2007 to June 1, 2007
June 12, 2007 to June 13, 2007
June 17, 2007 to June 18, 2007
June 21, 2007 to June 22, 2007

A summary of the data in question for the dates specified is provided as a separate submittal and can be found at: ["Data to be flagged.xls"](#).

What is an exceptional event? Exceptional event means an event that affects air quality, is not reasonably controllable or preventable, is an event caused by human activity that is unlikely to recur at a particular location or a natural event, and is determined by the EPA Administrator in accordance with 40 CFR 50.14 to be an exceptional event. It does not include stagnation of air masses or meteorological inversions, a meteorological event involving high temperatures or lack of precipitation, or air pollution relating to source noncompliance. Natural event means an event in which human activity plays little or no direct causal role.

What must be done to request exceptional event status for data? A State may request EPA to exclude data showing exceedances or violations of the national ambient air quality standard that are directly due to an exceptional event from use in determinations by demonstrating to EPA's satisfaction that such event caused a specific air pollution concentration at a particular air quality monitoring location.

Demonstration to justify data exclusion may include any reliable and accurate data, but must demonstrate a clear causal relationship between the measured exceedance or violation of such standard and the event in accordance with paragraph (c)(3)(iii) of this section. The demonstration to justify data exclusion shall provide evidence that: (A) The event satisfies the criteria set forth in 40 CFR 50.1(j); (B) There is a clear causal relationship between the measurement under consideration and the event that is claimed to have affected the air quality in the area; (C) The event is associated with a measured concentration in excess of normal historical fluctuations, including background; and (D) There would have been no exceedance or violation but for the event. (With the submission of the demonstration, the State must document that the public comment process was followed.)

The supporting documentation that is proposed to be used for justification of the flags to be applied will consist of a combination of satellite imagery, media reports of smoke intrusion into an area where there are no known local fire events and National Park Service or National Forest Service reports of fires in the parks or forest areas as examples of the sources that may be used. Local media reports of fire activity in or near a monitoring site or reports prepared by the local fire fighting agencies may also provide this documentation. The actual ambient air quality monitoring data also will be used to help determine if the measured values during the proposed exceptional event timeframes are significantly elevated in comparison to previous historic data for the monitoring site(s). PM fine speciation data will also be evaluated as another source of evidence to indicate that flagging is justified. The final documentation process and selection of the source(s) of data that best support the requested flagging actions are not complete at this time and are not required to be submitted to EPA until May 1, 2008.

Materials concerning the proposed flagging of exceptional affected event data will be available for public inspection during normal working hours starting on January 7, 2008, at the following location:

Tennessee Air Pollution Control Division
9th Floor L & C Annex
401 Church Street
Nashville, Tennessee, 37243-1531

All persons interested in ambient air monitoring in the State of Tennessee are urged to review and comment on the proposed data to be flagged. Any person desiring to present lengthy comments should provide a written statement. Written statements will only be considered if received by 4:30 p.m. January 22, 2008 at the office of the Technical Secretary, Tennessee Air Pollution Control Board, 9th Floor L & C Annex, 401 Church Street, Nashville, Tennessee, 37243-1531.